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Your ref:
Our ref: DC/14/498
Date: 14 March 2014

Dear Sir / Madam

TRAFFORD LOCAL PLAN: LAND ALLOCATIONS CONSULTATION DRAFT (JANUARY 2014)

Thank you for the opportunity to comment on the Trafford Local Plan: Land Allocations – Consultation Draft.

United Utilities is very keen to engage with the council on the preparation of the draft development land allocations document and notices a number of very significant strategic development sites. We have provisionally commented on these below. As the council knows from past discussions with colleagues, a fuller understanding of the impact on water and wastewater infrastructure can only be understood once more details are known, such as, the timescales for development, the approach to surface water management and the chosen points of connection. Once more information is available, which is often only available at the planning application stage, we will be able to better understand the impact on infrastructure and as a result it may be necessary to coordinate the delivery of development with the timing for the delivery of infrastructure improvements. We have recommended a policy in this respect.

In our comments below, you will notice that we have made numerous references to the importance of ensuring development is undertaken in accordance with the most sustainable approach to surface water management. You will notice we have recommended a specific policy. This policy and the other references we have suggested reflect the fact that the treatment and processing of surface water is a not a sustainable solution. Surface water should be managed at source and not transferred. Every option should be investigated before discharging surface water into a public sewerage network. This is particularly pertinent following the recent flooding we have seen in the UK.

At the larger development sites, we also highlight the importance of coordination between phases of development as part of a wider and holistic strategy in the interest of securing sustainable drainage systems.

We also encourage a water efficiency policy. We believe this to be a valuable part of the delivery of sustainable development.

Finally, we request support for our future capital investment programme. United Utilities is committed to supporting the delivery of development and economic growth in the North West and a key element of this is a planning system which is supportive of our capital investment needs. At the current time, we believe it may be necessary to invest at Davyhulme Wastewater Treatment Works and Partington Wastewater Treatment Works.

Our suggested amendments are set out below.

POM1 - Pomona Island Strategic Location

At paragraph 2.8 we suggest the following additional bullet point.

- *'Any development at the strategic location will need to ensure it secures the most sustainable and coordinated approach to surface water management. This should include consideration of future maintenance and management of any sustainable drainage system. Attenuated discharge of surface water to public sewer will be a last resort.'*

WHA1 – Wharfside Strategic Location

Under Policy WHA1, we suggest the following additional paragraph.

'Any development at the strategic location will need to ensure it secures the most sustainable and coordinated approach to surface water management. This should include consideration of future maintenance and management of any sustainable drainage system. Attenuated discharge of surface water to public sewer will be a last resort.'

WHA2 – Mediacity UK

At paragraph 3.19 we suggest the following additional bullet point.

- *'Any development at the strategic location will need to ensure it secures the most sustainable and coordinated approach to surface water management. This should include consideration of future maintenance and management of any sustainable drainage system. Attenuated discharge of surface water to public sewer will be a last resort.'*

LAN1 - Lancashire County Cricket Club Quarter Strategic Location

At paragraph 4.7 we suggest the following additional bullet point.

- *'Any development at the strategic location will need to ensure it secures the most sustainable and coordinated approach to surface water management. This should include consideration of future maintenance and management of any sustainable drainage system. Attenuated discharge of surface water to public sewer will be a last resort.'*

TCR1 - Trafford Centre Rectangle Strategic Location

After paragraph 5.8 we suggest the following additional paragraph.

- *'Any development at the strategic location will need to ensure it secures the most sustainable and coordinated approach to surface water management. This should include consideration of future maintenance and management of any sustainable drainage system. Attenuated discharge of surface water to public sewer will be a last resort.'*

TCR2 – Trafford Quays

At paragraph 5.19 we suggest the following additional bullet point.

- *'Any development at the strategic location will need to ensure it secures the most sustainable and coordinated approach to surface water management. This should include consideration of future maintenance and management of any sustainable drainage system. Attenuated discharge of surface water to public sewer will be a last resort.'*

CAR1 – Carrington Strategic Location

At paragraph 6.8 we suggest the following additional bullet point.

- *'Any development at the strategic location will need to ensure it secures the most sustainable and coordinated approach to surface water management. This should include consideration of future maintenance and management of any sustainable drainage system. Attenuated discharge of surface water to public sewer will be a last resort.'*

We also suggest paragraph 6.12 is amended as follows.

6.12 Significant new infrastructure will be needed to deliver this sustainable new community including: new road infrastructure; significant improvements to public transport; the provision of community facilities ~~and~~; high quality green infrastructure; and a coordinated approach to the delivery of new water and wastewater infrastructure between phases.

Flooding

We suggest the insertion of the following new policy in the flooding chapter.

' FL2 - Surface Water

12.9 Surface water should be discharged in the following order of priority:

- *An adequate soakaway or some other form of infiltration system.*
- *An attenuated discharge to watercourse.*
- *An attenuated discharge to public surface water sewer.*
- *An attenuated discharge to public combined sewer.*

12.10 Applicants wishing to discharge to public sewer will need to submit clear evidence demonstrating why alternative options are not available. Approved development proposals will be expected to be supplemented by appropriate maintenance and management regimes for surface water drainage schemes. On large sites, it may be necessary to ensure the drainage proposals are part of a wider, holistic strategy which coordinates the approach to drainage between phases, between developers and over a number of years of construction.

12.11 On greenfield sites, applicants will be expected to demonstrate that the current natural discharge solution from a site is at least mimicked. On previously developed land, applicants should target a reduction of surface water discharge.

12.12 Landscaping proposals should consider what contribution landscaping of a site can make to reducing surface water discharge. This can include soft and hard landscaping such as permeable surfaces.

12.13 The treatment and processing of surface water is a not a sustainable solution. Surface water should be managed at source and not transferred. Every option should be investigated before discharging surface water into a public sewerage network. A discharge to groundwater or watercourse may require the consent of the Environment Agency.'

Water Efficiency

We suggest a new policy on water efficiency which encourages the achievement of the water efficiency targets in level 3 of the Code for Sustainable Homes unless superseded by new national standards. Similarly, we encourage the inclusion of water efficiency measures in new commercial development.

We suggest this policy could be included in Chapter 11 which could be retitled 'A Low Carbon Future.' Improvements in water efficiency help to reduce pressure on water supplies whilst also reducing the need for the treatment and pumping of both clean and wastewater.

Infrastructure

In accordance with paragraphs 156 and 162 of the National Planning Policy Framework, we recommend the following new policies as part of a new chapter on infrastructure.

'INF1 – Infrastructure

Once more details are known on development sites, for example the approach to surface water management and the proposed connection points to the foul sewer network, it may be necessary to co-ordinate the delivery of development with timing for the delivery of infrastructure improvements.

At the larger development sites, it may be necessary to ensure that the delivery of development is guided by strategies for infrastructure which ensure co-ordination between phases of development over lengthy time periods and by numerous developers.

Trafford Council will support the principle of investment in infrastructure to respond to development and environmental needs. Infrastructure is key to the delivery of sustainable development and economic growth and meeting the development needs of the borough.

We understand it may be necessary to bring forward infrastructure investment at Davyhulme and Partington wastewater treatment works in the borough.'

We trust these comments are self-explanatory and we would be grateful if you can confirm receipt. United Utilities would welcome the opportunity to consider the comments in greater detail at a meeting. Once you have had an opportunity to digest our submission, please could you contact us on the number above so that this opportunity can be arranged.

Yours faithfully

Andrew Leysens
United Utilities
Developer Services and Planning